Personal data and anonymisation

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GDPR Principles

Article 5(1)
- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation (retention)
- Integrity and confidentiality (security)
5(2) Accountability

Personal data

- Information that relates to an identified or identifiable individual
- Directly / indirectly
- All the means reasonably likely to be used to identify
- ‘relates to’
Pseudonymised data
- Pseudonymising data is a good safeguard and reduces privacy risk
- But - pseudonymised data is still personal data
- However - sharing pseudonymised data with other organisations...

Anonymising data
- GDPR doesn’t define anonymised information
- Recital 26 – “information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or is no longer identifiable.”

Sharing data – risk management
- Consider:
  - Nature of the data
  - Volume
  - Recipient
  - Purpose
  - Publicly available data
  - Controls
- The role of risk assessment
Describe the processing
Consider consultation
Sign off and record outcomes
Assess necessity and proportionality
Identify and assess risk
Integrate outcomes into plan
Identify measures to mitigate risk
Identify a need for a DPIA
Describe the processing
Identify and assess risk

Accountability
Can you show how you are complying with the law?

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